



**By email only**

**Your ref:** WA0210001  
**Our ref:** CB/25/01151/OAC  
**Date:** 28/04/2025

**Dear Sir/Madam,**

**WA0210001 Grand Union Canal Transfer - EIA Scoping Notification and Consultation**

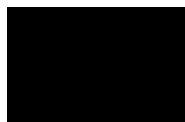
Thank you for your letter dated 31 March 2025 notifying Central Bedfordshire Council ("the Council") of this consultation.

This response is provided on behalf of the Council in relation to the applicants' Environmental Impact Assessment (EIA) Scoping Report, dated March 2025 which has been submitted in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The Council's response is provided at Appendix 1 and reviews the material submitted by subject area. The response is based upon a number of technical officers providing advice and, in the majority, technical specialists are in agreement with the conclusions of the applicants' Scoping Report. The Council welcomes the opportunity to be able to shape the scope of the Environmental Statement and the level of detail provided in some areas, as set out below.

We trust that the information within the Appendix is self-explanatory. However, if any further information is required, then please do not hesitate to contact the case officer, Fenella Hackney, [REDACTED]@centralbedfordshire.gov.uk.

Yours sincerely



Andrew Davie

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## **Appendix 1**

<b>Subject</b>	<b>Comments</b>
Legislation and Planning Policy Context	<p><u>Paragraph 2.3.10</u></p> <p>The new Local Plan for Central Bedfordshire is in its early stages of development and is yet to reach the Regulation 18 stage. However, it is considered that the emerging Local Plan should still be referenced within this table as it, and future proposed allocations, will need to be a consideration for the GUC project moving forwards.</p>
Air Quality and Odour	<p><u>Paragraph 9.4.9</u></p> <p>This paragraph states that there are no Suitable Alternative Natural Green Spaces (SANG) within the study area. Central Bedfordshire has SANGs within the southern part of its administrative area, two of which are considered would be impacted by the GUC proposal.</p> <p>Further guidance is provided within the 'Ecology – Terrestrial' section below.</p>
Cultural Heritage (Archaeology)	<p><u>General comments</u></p> <p>Where the EIA Scoping Boundary for the proposed scheme passes through Central Bedfordshire, it overlaps with a known archaeological landscape with evidence for occupation activity dating from the Palaeolithic through to the post medieval period entered on the Central Bedfordshire and Luton Historic Environment Record (HER).</p> <p>Within the Central Bedfordshire area, the Scoping Report and associated maps suggest that greatest archaeological impacts from the scheme will potentially come from the laying of the new underground pipeline. There may however be other impacts, such as from works to the historic canal structure itself (where the scheme passes along the canal through Leighton Buzzard). The Scoping Boundary passes through areas where there are known heritage assets with archaeological interest, but also areas that have the potential to produce heritage assets with archaeological interest. In most cases, the known heritage assets with archaeological interest are non-designated. Some of these survive as buried features below ground, but others are earthworks, forming a legible and fast diminishing part of authority area's past landscapes. In Central Bedfordshire, the Scoping Boundary does not intersect with any Scheduled Monuments, although several lie close to it. It does pass partly through a Registered Park and Garden (Battlesden Park HER9427, NHLE1000573: Grade II).</p> <p>The Caddington area of Central Bedfordshire has produced one of the largest concentrations of Palaeolithic implements in the County. In some cases, these artefacts were found <i>in situ</i>, although in others they</p>

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would be classed as “findspots”. These discoveries are internationally recognised. The geological strata of the Caddington area is such that deposits capable of bearing Palaeolithic remains could be found anywhere in the locality. Therefore, where the scheme passes through this area, it will be necessary for the results of geoarchaeological fieldwork to form part of the baseline Cultural Heritage data.

#### Chapter 11 – Cultural Heritage

##### *Table 11-1: National policies, plans and strategies – Cultural Heritage*

The table suggests that the assessment will be desk-based only. However, sections 11.7.7 and 11.7.8 indicate that the Cultural Heritage Chapter will also be informed by the results of walkover surveys, geophysical surveys, geoarchaeological deposit modelling and monitoring, and trial trench evaluation (if required). Section 11.9.1 also states geophysical survey and trial trench evaluation may be required (although they are considered in the mitigation section which is presumably an error).

It should be made clear that the baseline data will not just be drawn from desk-based research. This is because desk-based research alone will not be able to identify the nature, extent, character, state of preservation and significance of heritage assets with archaeological interest likely to be affected by the scheme.

For Central Bedfordshire, we expect the baseline data to include the results of non-intrusive surveys and for those survey results to have been tested in the field by intrusive evaluation. In opinion, if this data is not acquired, the Scheme will not comply with the national policies for the protection and enhancement of the historic environment.

##### *Table 11-2: List of relevant local policy – Cultural Heritage*

The Archaeology Team highlight that Chapter 18 of our Local Plan (2015-2035) has specific requirements. For example, for the impact of development proposals on archaeological earthwork sites. Given the Scoping Boundary intersects with numerous archaeological earthworks sites, some of which form part of the same contemporary landscape as designated remains (for example at Church End, Hockliffe) we consider the assessment needs to address each Local Authorities individual policies and requirements. We also consider it necessary for the baseline data to address whether in relation to Battlesden Park for example, the Scheme would comply with Policy HE2 of the Local Plan (Historic Parks and Gardens).

#### *11.5 Baseline Conditions*

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	<p>11.5.3 – This paragraph states that the information from Central Bedfordshire and Luton HER is presented using the unique HER prefix of MBD. These numbers are not the HER numbers for the authority area, this matter needs addressing and correcting.</p> <p>11.5.5 – This paragraph indicates that “findspots” have been scoped out of the assessment. The rationale given is that they represent the chance find of archaeological evidence which is no longer within the context it was found in. Whilst findspots may not represent heritage assets with archaeological interest, they can and do often provide indicators of where potential heritage assets with archaeological interest may lie. To scope out all findspots therefore, is to ignore the information the multiple items from the same place (particularly those of the same chronological period) may be telling us about what lies beneath the surface. We suggest this matter is reconsidered, if not for single items at least for the recovery of multiple artefacts.</p> <p>11.5.35 – 11.5.56 – These paragraphs discuss the known baseline data for Part 4b (the Pipeline to Underground Reservoir near Luton). To the knowledge of the Archaeology Team there are no Palaeolithic round barrows, we suggest the relevant experts address this error.</p> <p><u>Summary</u></p> <p>With reference to archaeology (whether designated or non-designated), the Environmental Impact Assessment needs to ensure that the baseline data acquired is sufficient to fully describe the significance of all heritage assets with archaeological interest that may be affected by the proposals and the impact each stage of the proposal will have on them. This includes identifying areas that have the potential to include heritage assets with archaeological interest. It must also be prepared by recognised archaeological specialists, with appropriate expertise. We acknowledge AECOM are involved with the project and have a demonstrated track record of working with them on infrastructure projects.</p>
Cultural Heritage (Built Heritage)	<p><u>Chapter 11 – Cultural Heritage</u></p> <p><i>Table 11-3: Summary of Study Areas – Cultural Heritage</i></p> <p>The Applicant should include a 1km study area from the EIA Scoping Boundary instead of 500m for designated heritage assets (but not NDHAs) to ensure all potential impacts on the historic environment are captured.</p>

	<p>11.5.35 - 11.5.36 and 11.5.55 - 11.5.56 - Additional NDHAs may still be identified – such as following site visits – so the current lists should not be considered definitive.</p> <p><i>11.9 Approach to Mitigation</i></p> <p>Further consideration should be given to mitigation regarding the setting of heritage assets, such as screening.</p> <p>The indicative pipeline routes suggest there would be some overlap with both designated and non-designated heritage assets. Any direct physical impact should be avoided, especially concerning designated assets.</p>
Ecology - Terrestrial	<p><u>General Comments</u></p> <p>The Environmental Impact Assessment (EIA) must adequately consider the Green Infrastructure network (GI), delivery and accessibility of sites designated as Suitable Alternative Natural Greenspaces to mitigate user impact on the Chiltern Beechwoods SAC (SANG sites), ecological connectivity, and associated landscape and public access across the project area.</p> <p>As part of the EIA, the applicant must provide an Environmental Statement (ES) which fully integrates GI and SANG site considerations across the relevant EIA chapters such as biodiversity and ecology, landscape and visual importance, water environment, and land use and access, and lastly recreation and health.</p> <p>Policy EE1 of the adopted Local Plan states that <i>'All major development proposals must demonstrate a net gain in green infrastructure, linking, enhancing, and extending existing green infrastructure assets, and creating new ones.... Where possible high quality, multi-functional green infrastructure will be integrated within developments, incorporating sustainable drainage systems, and enhancing biodiversity...landscape character, the Rights of Way network and design quality.'</i></p> <p>It is also expected that existing GI assets, including SANG sites, will be identified and mapped and assessments of potential impacts on connectivity and/or fragmentation of assets considered both before, during and after construction. Any detrimental or negative impacts must be avoided where possible, especially for any designated green corridors (public rights of way), SANG sites or priority natural features (include habitats and open spaces). Where avoidance is not possible compensatory measures must be utilised such as temporary alternative</p>

	<p>access routes, appropriate buffers, habitat restoration, or green corridor realignment. Any enhancement and/or restoration of GI assets and functions should be aligned with relevant local and regional GI strategies and aspirations and site management plans (including SANG Site Management Plans (e.g., Central Bedfordshire's Green Infrastructure Plan, Bedfordshire and Luton GI Strategy, any adopted Neighbourhood Plans and the emerging Local Nature Recovery Strategy).</p> <p>It is essential that the Grand Union Canal Transfer scheme not only avoids harm to existing GI and SANG sites but actively contributes to the enhancement of the network. We request that GI and SANG sites are treated as a cross-cutting theme throughout the EIA, and that opportunities to deliver wider environmental and community benefits are fully explored as part of the project design and assessment process.</p> <p><u>Chapter 13 - Ecology – Terrestrial</u></p> <p><i>3.5.11- 3.5.14 Non-Statutory Designated Sites</i></p> <p>-<b>Designated SANG sites</b> need to be referred to within this chapter, with the associated impact and mitigation addressed as necessary.</p> <p>It is considered that the red line of the working area for two indicative pumping stations shown on Sheet Z of Parts 2 &amp; 3 Canal Network Indicative Layout Plans within Figure 3-6 in Volume 2 of the EIA scoping report would encroach into Grovebury Quarry SANG.</p> <p>Route SP10 and SP10B for the proposed pipeline may also affect Cottage Bottom Fields SANG.</p> <p>All SANGs and their management plans can be viewed on the Council's website: <a href="#">Central Bedfordshire SANGs</a>.</p>
Landscape and Visual	<p><u>Chapter 16 – Landscape and Visual</u></p> <p><i>Table 16-1: National policies, Plans and Strategies – Landscape and Visual –</i></p> <p>-National Policy Statement for Water Resources Infrastructure (NPSWRI)</p> <p>As per the NPSWRI, the Applicant should include the following within the assessment:</p> <ul style="list-style-type: none"> <li>• 4.9.1 tranquillity and potential cumulative effects.</li> <li>• 4.9.3 the effects upon historic characterisation</li> </ul>

	<ul style="list-style-type: none"> <li>• 4.9.4 any noise and light pollution effects, including on local amenity, tranquillity and nature conservation</li> <li>• 4.9.6 demonstrate how they have fulfilled the requirements set out in Defra's 'English National Parks and the Broads: UK government vision and circular 2010' or successor documents. These requirements should also be complied with where infrastructure projects impact on Areas of Outstanding Natural Beauty.</li> <li>• 4.9.8 sets out requirements for mitigation <b>and good design</b> and to be included within the assessment. Applicant to also consider section 3.6 within NPSWRI.</li> </ul> <p>-National Planning Policy Framework (NPPF) The Applicant should also include the following NPPF paragraphs:</p> <ul style="list-style-type: none"> <li>• Paragraph 10 which sets out requirements for sustainable developments,</li> <li>• Paragraph 105 which sets out that planning policies and decisions should protect and enhance public rights of way and access,</li> <li>• Paragraphs 129 &amp; 129(e) which sets out requirements for well-designed, attractive and healthy places.</li> <li>• Paragraph 131 which sets out the requirement for good design and effective engagement between applicants, communities, local planning authorities and other interests throughout the process.</li> </ul> <p>-Planning Practice Guidance (PPG) The Applicant should also include Natural Environment which sets out the benefits of landscape character assessments and the importance of considering Green Infrastructure in the early stages of schemes.</p> <p><i>Table 16-2: List of relevant local policy – Landscape and Visual</i> The Applicant should include the following relevant CBC local plan policies within the assessment:</p> <ul style="list-style-type: none"> <li>• Policy EE1: Green Infrastructure which aims to link, enhance and extending existing and new green infrastructure assets,</li> <li>• Policy EE5: Landscape Character and Value,</li> <li>• Policy EE12: Public Rights of Way which aims to protect, enhance and promote PROWs.</li> <li>• There are also several policies which relate to contributors to landscape value - for instance, Policy EE2 (Enhancing Biodiversity), Policy EE4 (Trees, Woodlands and Hedgerows) which affords protection to trees, woodlands and hedgerows</li> </ul>
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	<p>The following adopted Neighbourhood Plans to be taken into consideration within the assessment:</p> <ul style="list-style-type: none"> <li>• Caddington &amp; Slip End Neighbourhood Plan</li> <li>• Eaton Bray Neighbourhood Plan</li> <li>• Totternhoe Neighbourhood Plan</li> </ul> <p><i>16.4 Study Area</i></p> <p>16.4.2 – The extent of the LVIA Study Area to be reviewed throughout the iterative design process and via fieldwork in summer and winter to understand the likely visibility of the Proposed Development and confirm the selection of viewpoints, as well as to identify specific landscape features and understand the local landscape character.</p> <p>16.4.3 – Preliminary Zones of Theoretical Visibility (ZTV) for Part 4a (Site H) of the Proposed Development is acceptable. However, due to the low-lying nature of the existing landscape, the Applicant should also include ZTV studies for the temporary construction compounds to the north and south of Leighton Buzzard within Part 2.</p> <p>Study area to be 2km when located in the rural landscape and 1km within the townscape.</p> <p><i>16.5 Baseline Conditions</i></p> <p>16.5.19 – Table 16-6 indicates proposed viewpoint locations. All viewpoints are located upon PROWs and the canal which are acceptable. However, the Applicant should provide representative or specific viewpoints from roads, rails and public open spaces within the study area.</p> <p>16.5.36 – Table 16-9 indicates proposed viewpoint locations. Viewpoints are located upon PROWs and roads which area acceptable. However, the Applicant should provide additional representative or specific viewpoints from roads and public open spaces within the study area.</p> <p><i>16.6.10 Table 16-11: Potential effects during the operational phase – Landscape and Visual Amenity</i></p> <p>Scoped In: Parts 1a, 2, 3, 4a and sections of 4b Landscape and Visual effects.</p> <p>The Applicant should also scope in include the following designations both within and outside the National Landscapes:</p> <ul style="list-style-type: none"> <li>• Registered Parks and Gardens</li> <li>• Listed buildings</li> <li>• Ancient woodlands</li> <li>• County wildlife sites</li> </ul>
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	<ul style="list-style-type: none"> <li>• Local Nature Reserves</li> <li>• Sites of Special Scientific Interest</li> <li>• Scheduled monuments</li> <li>• Conservation Area</li> <li>• Designated sites within adopted neighbourhood plans</li> </ul> <p>6.11 – Night-time assessment has been scoped out of the assessment. However, no supporting information has been provided indicating why this has been excluded. Applicant to provide a lighting assessment for Part 2 Construction compounds and Part4a (site H). Assessment to include the visibility and conspicuousness of the proposed development during construction and the potential impacts on views and visual amenity. The LVIA should set out the method for assessment of night-time effects and how change from the baseline conditions has been determined.</p> <p><i>16.7 Approach to Assessment</i></p> <p>6.5.20 – This paragraph outlines the periods of assessment during construction and operation. In total, only 3 assessments are to be considered which is inadequate. The following approach is suggested:</p> <p>The landscape and visual effects of the proposed development should be evaluated during the winter of the construction phase to capture the effects when construction will be most visible. The effects should be evaluated during winter and summer in year 1 of operation and during summer in year 15 of operation. The mitigating effects of maturing mitigation planting, implemented as part of the proposed development, should also be considered in the evaluation of effects in summer year 15 to demonstrate the maximum effectiveness of the planting. (4 assessments in total)</p> <p>16.7.2 – The Applicant should consider the following relevant CBC local planning guidance within the assessment:</p> <ul style="list-style-type: none"> <li>• Central Bedfordshire Green and Blue Infrastructure Strategy (2022)</li> <li>• Central Bedfordshire Council Design Guide (2023)</li> <li>• Central Bedfordshire Council Tranquillity Strategy (2022)</li> </ul> <p>16.7.5 – All viewpoints inclusive of viewpoints which have been discounted should be documented for transparency within the methodology.</p> <p>16.7.11 – As per the Landscape Institutes ‘Assessing Landscape Value A Technical Guidance Note’, the Applicant should include the following factors:</p> <ul style="list-style-type: none"> <li>• Natural heritage</li> </ul>
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- Cultural heritage
- Distinctiveness
- Perceptual (Wildness and tranquillity)
- Functional

#### *16.7.21 - 16.7.24 Magnitude of Impacts*

16.7.24 – At paragraph (e), the Applicant should define ‘duration’ within the assessment. Short term durations are considered to be under one year; medium term durations are considered to be between one and five years, and long-term durations are considered to be more than five years.

Estimated planting growth heights should also be included within duration terms.

#### *16.10 Approach to Mitigation*

6.10.4 - The provision of a Landscape Ecological Management Plan is welcomed. Mitigation proposals should be considered as part of a landscape strategy which considers Green Infrastructure in a wider context. Initially, the Landscape Strategy should focus on overarching principles with clear aims and objectives. Objectives should be clear and include landscape, biodiversity and Green Infrastructure. Landscape and visual mitigation should drive the strategy and be linked through to the management plan (rather than just a maintenance schedule).

Landscape proposals and mitigation should have regard for and contribute to the wider landscape character, connective of green infrastructure and sustainable transport.

As per paragraph 6.7.8, the Applicant should ensure that the effectiveness of any proposed mitigation measures is thoroughly assessed in the LVIA, describing the likely significant effects of the proposed development both prior to mitigation and residually so that it is possible to understand the efficacy of proposed mitigation measures.

The LVIA should also explain how measures proposed to mitigate landscape and visual effects, such as planting, may relate to other aspects, for instance impacts on ecological receptors. Appropriate cross reference should be made between related aspects in the LVIA, such as Biodiversity, and Historic Environment.

#### General Comments:

##### *Monitoring*

As per 6.7.10, the Applicant should outline monitoring methods to be employed to ensure the effectiveness of mitigation.

	<p><i>Cumulative Effects Assessment</i> As per 6.9, the Applicant should consider the assessment of two types of cumulative effects within the LVIA.</p> <p><i>Climate change</i> The LVIA should outline the likely evolution of the baseline for receptors without the proposed development as far as natural changes can be assessed based on available information and scientific knowledge.</p> <p>Applicant to include the effects of climate change inclusive of mitigation. See Landscape Institutes <a href="#">policy document</a> on climate change or IEMA guidance.</p> <p><i>Visual Representation of Development Proposals</i> The LVIA should include visual representations of both the baseline view and the view incorporating the Proposed Development as per recommendations in Landscape Institute’s Technical Guidance Note 06/19: Visual Representation of Development Proposals, 2019. Views should be numbered and cross-referenced to accurately plotted locations on an OS map of appropriate scale, and showing the angles of the views. The Applicant should outline the methodology, the viewpoint locations and the assessment years.</p> <p><i>Tranquillity</i> As per NPSWRI, consideration should be given to assessment of tranquillity and effect on local character and setting, particularly in relation to heritage and other local sensitive receptors such as heritage assets &amp; PROWs.</p> <p>The Applicant should refer to The Central Bedfordshire Tranquillity Strategy (LUC, 2015) and assess within each landscape receptor.</p> <p><i>Chilterns National Landscape</i> The LVIA to assess the Landscape and Visual Effects upon the special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the National Landscape designation. The Applicant should also outline how the development meets the aims of the statutory Chilterns National Landscape Management Plan.</p>
Socio-economics	<p>9.1.2 – Users of Public Rights of Way are identified as a socio-economic receptor of the proposed development.</p> <p><u>General Comments on Public Rights of Way:</u> With a total of 47 Public Rights of Way (PROW) affected during this proposed development it is imperative that a schedule for the works is</p>

	<p>submitted many months in advance. Each path will require a Temporary Traffic Regulation Order (TTRO) to temporarily close the path to the public, which involves time consuming legal work, consultation, advertising, etc.</p> <p>Ideally, an alternative route for the public to use to an equal classification, is to be found for each of the paths for the duration of the works.</p> <p>Applications for the TTRO's will need the alternative routes included.</p> <p>There are several parishes that will be more affected by this development, such as Caddington and Kensworth, as showed on Figure Title - Part 4b PRoW affected by the proposed development Sheets G &amp; H, where a high number of paths in a single parish are affected.</p> <p>These are extremely well used and popular paths, in addition to the many affected paths through the CBC that are part of promoted and long-distance routes.</p> <p>The development will affect whole communities who use the paths for health and recreation as well as routes to access work/shopping. From both sides it would be beneficial to have the paths closed for the shortest period of time.</p> <p>A Public Rights of Way Scheme will need to be submitted in line with CBC Policy EE12:  'Development proposals for sites that include a Right of Way ..... will be required to submit a Rights of Way Scheme that demonstrates how the development will protect, enhance and promote the public Rights of Way network. This must include, where necessary, improvements to help restore and re-connect Rights of Way.'</p> <p>We would expect to see paths that have permitted use as an alternative route during the development works to be dedicated, or formalised as permissive routes, post-development that will add links and reconnect to existing PRoW.</p> <p>As part of the Rights of Way Scheme to be submitted, there needs to be information on how the surface will be reinstated after the works. It is essential that these works avoid harm to any other areas of the public paths or the character of the way.</p>
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Traffic and Transport	<p><u>Chapter 20 – Traffic and Transport</u></p> <p><i>20.5 – Baseline Conditions</i></p> <p>It is understood that publicly available mapping, traffic data, and collision data will be utilised, with traffic surveys on routes expected to experience ‘significant’ traffic impacts.</p> <p>Whilst the use of publicly accessible information would be considered suitable for broad assessment, where limited impacts are forecast, there are likely to be areas where more detailed and refined information may be required, for example where access or highways works are proposed, and where public mapping and aerial imagery would not be considered as sufficiently detailed (where topographical surveys may be required, or where collision data from the Local Authority may be necessary).</p> <p>Similarly, in some instances it may be difficult to determine whether the 10% or 30% impact thresholds for assessment under the IEMA guidance have been reached or exceeded without baseline traffic survey data. As such, it is expected that traffic surveys will be required, the scope of which should be agreed with the Council.</p> <p>Central Bedfordshire Council hold traffic data for a number of sites across the authority area, and the Applicant would be encouraged to liaise with the authority on any existing data availability.</p> <p>With regards to the geographical extent of the assessment, this is not currently defined, but it is understood that the initial extent of assessment would be based upon both the boundaries identified within the submission (associated with the physical infrastructure proposals and pipeline corridors) and identified construction and diversion routes as per section 20.4 of the submitted document.</p> <p>Central Bedfordshire Highways DM would generally be in agreement with this approach, with the construction phase resulting in the most significant expected impacts related to the development within Central Bedfordshire, and with the impacts of construction traffic, road closures, and diversions, expected to have the greatest environmental effects.</p> <p>In terms of the subsequent more detailed assessment, it is understood that the criteria contained within the IEMA document Environmental Assessment of Traffic and Movement will be used to define the</p>
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	<p>geographic extent of assessment applying the 2 rules within that document (30% increase in traffic – or the HGV component, or 10% increase in sensitive locations).</p> <p>CBC Highways DM would agree with this approach but would expect to be consulted upon the definition of locations to be treated as ‘sensitive’ as per the guidance. CBC would also expect to be involved in the identification and agreement of sensitive receptors (as per para 20.7.15 onwards).</p> <p>20.5.5 - With regards to the factoring of base traffic flows using TEMPRO v 8.0, this would not be considered appropriate in isolation, and any Transport Chapter (and the Transport Assessment upon which much of the traffic data and assessment within the Transport Chapter would be based) should be scoped with the Council before any forecasting work is undertaken to determine any specific committed developments or changes in infrastructure which would need to be accounted for. It is possible that this could vary from the long list of cumulative schemes detailed in Appendix 6-1, as some major committed development may have a traffic impact beyond the distance thresholds applied.</p> <p><i>20.6 – Potential Effects</i></p> <p>CBC Highways DM would agree that the predominant expected effects would be during the construction, rather than operational phase of development, although the associated Transport Assessment would be expected to quantify, assess, and, if necessary, mitigate, operational phase impacts.</p> <p>It is agreed that all the potential construction phase impacts listed should be scoped into the assessment, although CBC Highways DM would query the exclusion of the assessment of Large Loads. At this stage it is not clear whether abnormal loads will be associated with some of the works proposed, and as such it would seem premature to exclude this element of assessment.</p> <p><i>Table 20-9: Magnitude of Effect of Affected Parties / Receptors</i></p> <p>With regards to the proposed definition of traffic increases of less than 30% per hour as ‘negligible’ and the proposed definition of increases on a link or junction below 30 vehicles as ‘negligible’, CBC Highways DM would not consider these exclusions to be appropriate.</p>
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	<p>Based upon the proposed classification of effects matrix in Table 20-10 (and assuming that 'negligible' would correspond with the 'very low' magnitude of impact), this would exclude both of the above from the need for any further consideration or assessment, as the greatest possible classification of effect would be 'minor'.</p> <p>Whilst in many cases an increase of 30 vehicles may not have a significant impact, increases of 30 HGVs an hour, for a prolonged period through a village (for example), or passing a sensitive receptor would be considered to be appropriate for further assessment. The proposed approach would also appear to remove the need to assess any impacts which trigger Rule 2 (impacts exceeding 10%, but lower than 30% in sensitive locations).</p> <p>Notwithstanding the above, CBC Highways DM would expect any assessment of impact (in terms of changes in flows) to be based not only on direct development impacts (i.e. construction related vehicle movements) but also secondary impacts (i.e. where prolonged closures or diversions may result in the rerouting of existing traffic).</p> <p>With regards to the proposed assessment criteria, CBC Highways DM would largely agree with the approach proposed, other than that for Driver Delay. Increases in flows would not directly equate to measurable impact, albeit it may be used as a proxy for increased potential delay on links. However, the majority of delay is experienced at junctions, with the IEMA guidance refers to the use of proprietary modelling software to assess the level of impact in these instances.</p> <p>As such, CBC Highways DM would expect to see the more detailed, comparative assessment of impact at junctions where necessary (the scope of which would be expected to be defined via the Transport Assessment scoping process).</p>
Minerals and Waste	<p><u>General Comments:</u></p> <p>It is noted that proposed pipeline options SP10 and SP10A are in the vicinity of Kensworth quarry near Dunstable.</p> <p>This is an active chalk quarry, whose operations and potential future expansion might be negatively impacted by the development scheme.</p> <p>It is recommended that operators of existing quarries in the vicinity of the scheme be contacted to ensure that impacts on their commercial interests are taken into account.</p>

<p>Water Environment and Flood Risk</p>	<p><u>Chapter 22: Water Environment and Flood Risk</u></p> <p><i>Table 22-3: List of other relevant regional or local strategic documents</i></p> <p>This table does not reference key local evidence documents including:</p> <ul style="list-style-type: none"> <li>• Central Bedfordshire Council’s Strategic Flood Risk Assessment (SFRA)</li> <li>• Water Cycle Studies</li> <li>• Local Flood Risk Management Strategy (LFRMS)</li> <li>• Central Bedfordshire Council’s adopted land drainage byelaws.</li> </ul> <p>These documents were produced to support our Local Plan and are critical in understanding the flood risk and water environment in our area. They are available via our website.</p> <p><u>General Comments</u></p> <ul style="list-style-type: none"> <li>• Flood risk and wider water environment considerations appear underexplored.</li> <li>• It is noted that water will be abstracted from the Grand Union Canal (GUC) at Leighton Buzzard and treated before distribution. However, Leighton Buzzard has a significant history of flooding from both the River Ouzel and Clipstone Brook.</li> <li>• Monitoring within the catchment is currently limited. There is a known relationship between river levels and overtopping risk of the canal infrastructure, which is not well understood. This interaction must be explored further, and measures taken to mitigate any existing and potential flood risks. Development must not lead to any detrimental impacts on local flood risk.</li> </ul> <p><u>Strategic Context</u></p> <ul style="list-style-type: none"> <li>• Central Bedfordshire Council, the Environment Agency, and the Internal Drainage Board are jointly considering the viability of strategic flood alleviation measures within the Ouzel and Clipstone Brook catchments. These include areas within a 1 km receptor buffer of the scheme (e.g. Leighton Buzzard and Hockliffe).</li> <li>• We request that the delivery of the scheme be informed by these discussions and that a consolidated plan for flood mitigation be developed in partnership with Risk Management Authorities (RMAs).</li> </ul> <p><u>Consultation Requirements</u></p> <ul style="list-style-type: none"> <li>• The Internal Drainage Board must be formally consulted due to its jurisdiction and operational interest in the area.</li> </ul>
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	<p><u>Catchment-Wide Impact</u></p> <ul style="list-style-type: none"> <li>• The report recognises that the GUC crosses or is connected to watercourses in Central Bedfordshire, including the River Ouzel.</li> <li>• Given the River Ouzel's influence on the River Great Ouse, which drains a wider catchment including Central Bedfordshire, we require full details to assess: <ul style="list-style-type: none"> <li>• Anticipated impacts on catchment flow timing and peak levels.</li> <li>• How the scheme may influence flood characteristics at the sub-catchment and catchment scale.</li> <li>• Interconnectivity with the canal and Clipstone book, taking into account recent and historic flooding in the area.</li> </ul> </li> </ul> <p><u>Site-Specific Flood Risk Requirements</u></p> <p>We require detailed assessment of flood risk at the following locations:</p> <ul style="list-style-type: none"> <li>• Three Locks – High risk of flooding associated with the River Ouzel, affecting the northern edge of a Possible Construction Area.</li> <li>• Leighton – Medium risk of flooding associated with the River Ouzel, affecting a Possible Construction Area and the potential Grand Union Canal transfer site.</li> </ul> <p><u>Surface Water Flooding</u></p> <ul style="list-style-type: none"> <li>• Surface water flood risk does not appear to be given sufficient consideration. This must be addressed, and relevant data shared for our review.</li> </ul> <p><u>Detailed Flood Risk Areas</u></p> <p>22.5.151 – 22.5.157 identifies flood risks to Leighton Buzzard at:</p> <ul style="list-style-type: none"> <li>• The south-east of West Bletchley (River Ouzel passing through Site B near the A4146 – Figure 22-27, Sheet A)</li> <li>• Slapton (an un-named tributary adjacent to Site H; Whistle Brook and the River Ouzel within the Part 4a study area – Figure 22-27, Sheet E)</li> </ul> <p>These areas are vulnerable and must be assessed in detail with appropriate mitigation measures proposed.</p> <p><u>Construction Phase Impacts</u></p> <p><i>Table 22-28: Potential effects during the construction phase – Water Environment and Flood Risk</i></p>
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	<p>This table outlines potential increased flood risk during construction from multiple sources, including:</p> <ul style="list-style-type: none"> <li>• Reservoirs, groundwater, fluvial (main and ordinary watercourses), and surface water</li> </ul> <p>These risks are unacceptable in their current form and must be fully mitigated.</p> <p>Additionally:</p> <ul style="list-style-type: none"> <li>• Sewer flooding and exceedance of highway drainage are likely if river levels rise, as this restricts outfalls. This risk must also be addressed through mitigation.</li> </ul> <p><u>Further Assessments and Drainage Strategies</u></p> <p><i>22.7 Approach to Assessment</i></p> <p>We acknowledge section 22.7 indicates further details will be shared with LLFAs. This must include surface water drainage strategies and be provided at the earliest opportunity for our review.</p> <p><i>22.9 Approach to Mitigation</i></p> <p>Mitigation comprises 3 key components:</p> <ol style="list-style-type: none"> <li>a) Embedded mitigation – e.g. use of trenchless construction techniques and appropriate siting of infrastructure</li> <li>b) Additional mitigation – e.g. water quality protection, canal operational adjustments, raising infrastructure</li> <li>c) Standard construction controls – e.g. silt management, site practices</li> </ol> <p>We require full details of all proposed measures to assess their adequacy and effectiveness in managing flood and water environment impacts.</p> <p><u>Conclusion</u></p> <p>Please ensure that all identified points are addressed through further documentation and shared with Central Bedfordshire Council in its role as Lead Local Flood Authority (LLFA) and as a key stakeholder in this process.</p>
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